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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**META PLATFORMS, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Judge: Hon. James Donato

STANDING ORDER PARAGRAPH 31 NOTICE

The parties have agreed to use the approach outlined in Paragraph 31 of the Court's Standing Order for Civil Cases for the rounds of briefing associated with User Plaintiffs' and Advertiser Plaintiffs' motions for class certification, and any related *Daubert* briefing, including Defendant Meta Platforms, Inc.'s Motion to Exclude the Testimony of Nicholas Economides. Meta hereby notifies the Court that the parties will file a combined Administrative Motion to Seal when briefing on the class certification and related *Daubert* motions is complete. That combined Administrative Motion to Seal will address all relevant documents submitted in connection with this briefing. Meta will work in good faith to minimize the amount of material sought to be sealed in that motion in accordance with the applicable standard and this Court's prior guidance. *See* Dkt. 344.

META PLATFORMS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL

Pursuant to Civil Local Rules 7-11 and 79-5(c), Defendant Meta Platforms, Inc. respectfully files this Administrative Motion To File Under Seal certain exhibits to the Supplemental Declaration of David Z. Gringer in support of its Motion to Exclude the Testimony of Nicholas Economides, Dkt. 650. Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(c) provided that the party seeking the relief can show that there are "legitimate private or public interests that warrant sealing" that "injury will result if sealing is denied" and "why a less restrictive alternative to sealing is not sufficient." L.R. 79-5(c)(1).

Pursuant to Paragraph 31 of this Court's Standing Order for Civil Cases, Meta will provide a "more fulsome and revised motion to seal" after the completion of briefing. Meta has lodged under seal deposition excerpts of certain of its current and former employees, which have been designated Highly Confidential or Confidential under the Stipulated Protective Order. Dkt. 314. Meta also has lodged under seal excerpts of the depositions of the named User Plaintiffs, which are designated Highly Confidential or Confidential under the Stipulated Protective Order, Dkt. 314

Meta has lodged under seal the following materials referencing Meta's information:

Document	Portions to Be Lodged Under Seal	Designating Party
Ex. 8 to the Supp. Decl. of David Z. Gringer in Support of Meta's Motion to Exclude Testimony of Nicholas Economides	In its entirety	Meta
Ex. 9 to the Supp. Decl. of David Z. Gringer in Support of Meta's Motion to Exclude Testimony of Nicholas Economides	In its entirety	Meta
Ex. 10 to the Supp. Decl. of David Z. Gringer in Support of Meta's Motion to Exclude Testimony of Nicholas Economides	In its entirety	Meta and User Plaintiffs
Ex. 11 to the Supp. Decl. of David Z. Gringer in Support of Meta's Motion to Exclude Testimony of Nicholas Economides	In its entirety	Meta and User Plaintiffs
Ex. 12 to the Supp. Decl. of David Z. Gringer in Support of Meta's Motion to Exclude Testimony of Nicholas Economides	In its entirety	Meta and User Plaintiffs

As noted, upon the conclusion of briefing on class certification motions and related *Daubert* motions, the parties will submit a combined Administrative Motion to Seal that will contain additional detail addressing each of the above documents and any additional documents containing Meta's, plaintiffs', and relevant non-parties' confidential information submitted in connection with the briefing on class certification motions and related *Daubert* motions.

1 Date: September 18, 2023

Respectfully submitted,

2 By: /s/ Molly M. Jennings

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2023, I caused the foregoing document to be transmitted via electronic mail.

/s/ Molly M. Jennings

Molly M. Jennings